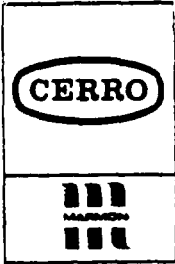


SDMS US EPA REGION V -1

**SOME IMAGES WITHIN THIS
DOCUMENT MAY BE ILLEGIBLE
DUE TO BAD SOURCE
DOCUMENTS.**



CERRO COPPER PRODUCTS CO.

A member of The Marmon Group of companies

P.O. Box 681

East St. Louis, Illinois 62202

618/337-6000

cc: D. Kessel A.L.
P. Tandler 10/9/86

153794

October 9, 1986

EXPRESS MAIL

Dr. James Patterson
Patterson & Associates
1540 N. State Parkway
Unit 13-A
Chicago, IL 60610

Dear Jim:

I have attempted to assemble the data supplied by you and Larry Oliver into a form that can be submitted to the EPA, and have encountered several problems.

In your phone call from Los Angeles on October 8 you gave me a figure of 56.2 gpm for average flow from Metal Molding and Casting operations. This is the same number that Larry Oliver reported as a total flow from sample point 9A which includes non-contact cooling water and sanitary waste-water. It also includes a small flow from the billet sawing operation which, we previously agreed, probably comes under the Copper Forming regulations. I wonder if it would not be appropriate to reduce the 56.2 gpm figure, using estimated values for the flows that are not regulated under Metal Molding and Casting standards to accomodate the combined waste stream formula.

You also gave the figure of 51.6 gpm for Non-Ferrous Metals which you pointed out was total process flow including some unregulated flows. It seems to me that the only regulated flow we have for NFM is the 10.8 gpm at sample pint 7A and possibly the 1.6 gpm from sample point 6C. You will recall that we are not sure where the flow measured at point 6C comes from because there is a fifty year old maze of sewers in that area.

For the flow from Copper Forming operations you gave me the figure of 78.2 gpm. I assume this is a combination of the 60.7 gpm from point 2A and 17.5 gpm from point 3B. The flow at point 2A definitely includes flow from unregulated processes as well as sanitary waste, and the same is possibly true for the flow at point 3B. Also, there is some flow from copper forming operations that reaches the East outfall without going through sample point 2A; these would be picked up at point 13C, however 13C was not sampled in Phase II, only in Phase I.

C07316

CERRO COPPER PRODUCTS CO.

A member of The Marmon Group of companies

Dr. James Patterson
Patterson & Associates
October 9, 1986
Page 2

I have placed the data we have on two different forms of chart and would appreciate your recommendation of which should be used, or perhaps you have an idea that is better than these two. As you can see, placing the flow quantities on the plant layout showing the location of the sample points highlights the several incongruities pointed out above. The other format, a single line diagram, appears to be an over simplification; perhaps attaching to it the three sheets provided by Larry Oliver would make it more complete without making the aforementioned questionable points so conspicuous.

As you know we are supposed to have this information in the hands of the EPA by next Wednesday. On Friday, October 10, I will be out of town and Paul will be in meetings outside the plant most of the day; neither of us will be available on Monday the 13th because of a religious holiday. I will try to reach you by phone in the late afternoon on October 10 so that I will have an opportunity to implement any suggestions you have to offer in time for sending out our report on October 14.

Kindest personal regards.

Sincerely,

CERRO COPPER PRODUCTS CO.
A member of The Marmon Group
of companies



S. A. Silverstein
Manager of Energy and
Environmental Affairs

SAS/ge

Enclosures

P.S. Would appreciate any comments you have on the attached draft letter to EPA.

S.A.S.

C07317

D R A F T

Ms. Ann Weinert
U.S. EPA, Region V
230 S. Dearborn
Chicago, IL 60604

Dear Ms. Weinert:

Our letter of September 16, 1986 advised that data relating to the nature of our operations would be submitted by the end of September with flow data following by October 15. On September 29 we forwarded the requested documents covering the Nature of Operations and attached hereto are appertaining flow data.

The five year history was derived from reports regularly submitted by the Sauget POTW. We believe these figures are higher than our actual flow and for a number of years we have been working with the POTW in an attempt to improve the validity of their method of measuring and calculating flows.

The flow chart incorporating regulated processes includes data extracted from the initial compilations of our Phase II study. As we previously pointed out this Phase II study covers a very complex system and incorporates a very large data base which Patterson & Associates Inc. is in the process of rationalizing. Our flow data will be refined in the Phase II study and a more comprehensive set of data will be included in our next submission.

Patterson & Associates Inc. reports that they are on schedule with the Phase II study and we therefore expect to submit the requested information

on Nature and Concentration of Pollutants, in addition to details of waste-water flows, by December 31, 1986.

Very truly yours,

CERRO COPPER PRODUCTS CO.
A member of The Marmon Group
of companies

S. A. Silverstein
Manager of Energy and
Environmental Affairs

SAS/ge

cc: R. Kissel
J. Patterson
P. Tandler

SEWER FLOW - TOTAL VOLUME BY MONTH (x 10⁶)

	<u>East Outfall</u>	<u>West Outfall</u>	<u>Total to Sauget Plant</u>
1982 - January	20.0	12.3	32.3
February	15.5	14.8	30.3
March	19.5	18.5	38.0
April	13.1	15.2	28.3
May	13.5	10.5	24.0
June	11.8	10.5	22.3
July	12.2	7.8	20.0
August	11.5	14.7	26.2
September	11.0	12.2	23.2
October	9.5	11.3	20.8
November	10.8	11.5	22.3
December	13.0	9.0	22.0
1983 - January	15.8	10.0	25.8
February	13.7	15.0	28.7
March	11.7	11.5	23.2
April	14.0	10.1	24.1
May	12.8	9.8	22.6
June	8.5	7.4	15.9
July	7.3	14.9	22.2
August	5.2	12.0	17.0
September	6.8	6.5	13.3
October	6.1	6.5	12.6
November	6.3	3.1	9.4
December	9.6	4.7	14.3
1984 - January	10.0	4.4	14.4
February	10.2	5.0	15.2
March	14.0	7.0	21.0
April	11.1	4.0	15.1
May	9.6	4.1	13.7
June	11.2	10.2	21.4
July	9.5	9.2	18.7
August	10.5	8.5	19.0
September	8.6	6.8	15.4
October	11.0	6.8	17.8
November	16.6	8.5	25.1
December	10.5	6.8	17.3

	<u>East Outfall</u>	<u>West Outfall</u>	<u>Total to Sauget Plant</u>
1985 - January	17.5	12.0	29.5
February	16.3	14.0	30.3
March	14.8	13.1	27.9
April	12.0	13.0	25.0
May	9.9	16.3	26.2
June	4.3	14.7	19.0
July	2.6	6.8	9.4
August	18.0	7.4	25.4
September	14.4	4.0	18.4
October	18.0	4.7	22.7
November	14.4	4.5	18.9
December	14.4	6.0	20.4
1986 - January	8.8	3.6	12.4
February	7.0	2.0	9.0
March	12.0	4.0	16.0
April	21.2	4.4	25.6
May	4.5	3.9	8.4
June	9.4	3.5	12.9
July	7.6	6.3	13.9
August	6.3	6.3	12.6
September	6.2	5.6	11.8
October			
November			
December			

CERRO COPPER PRODUCTS CO.

A member of The Marmon Group of companies

By SAS Date 10.3.86

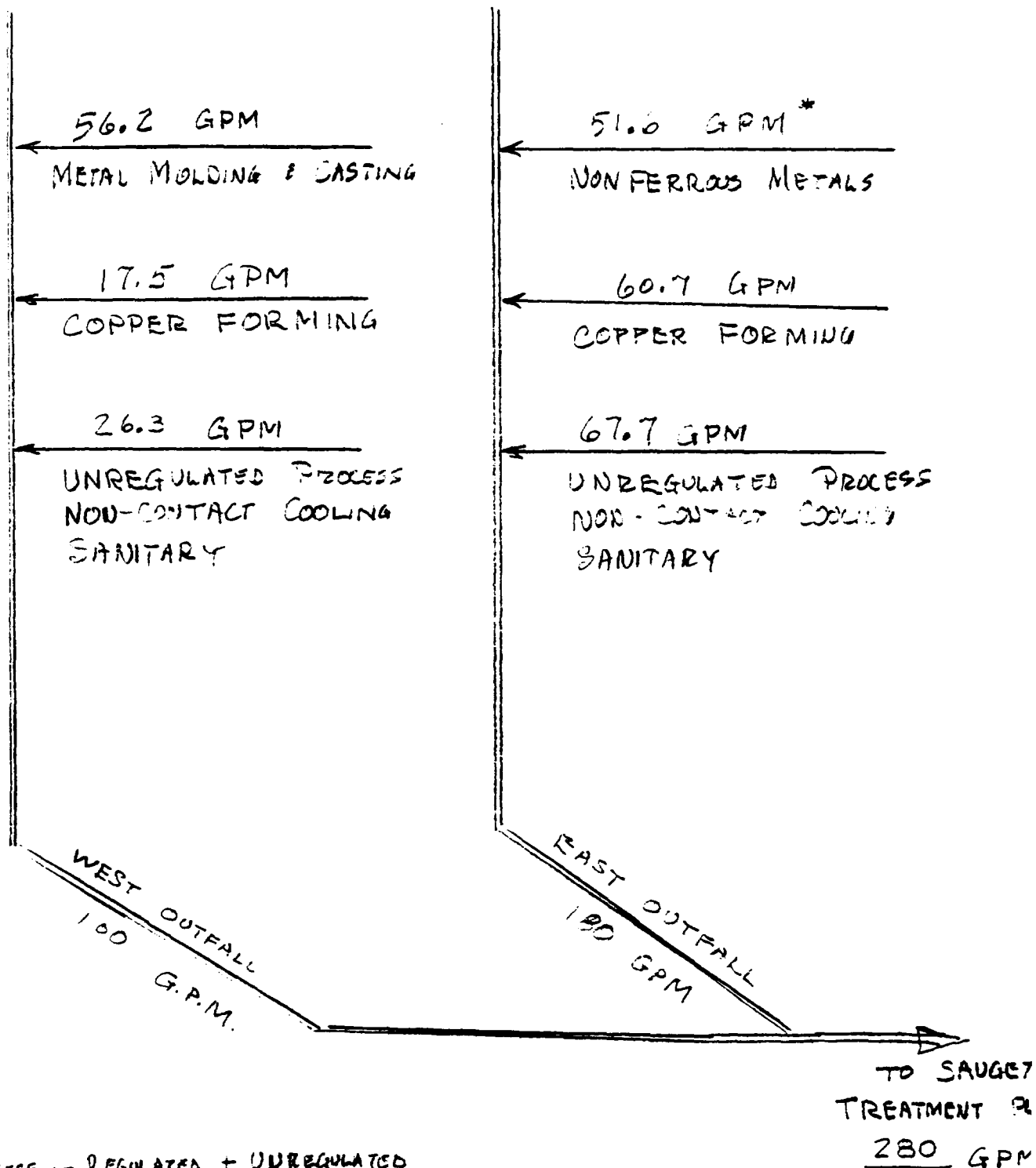
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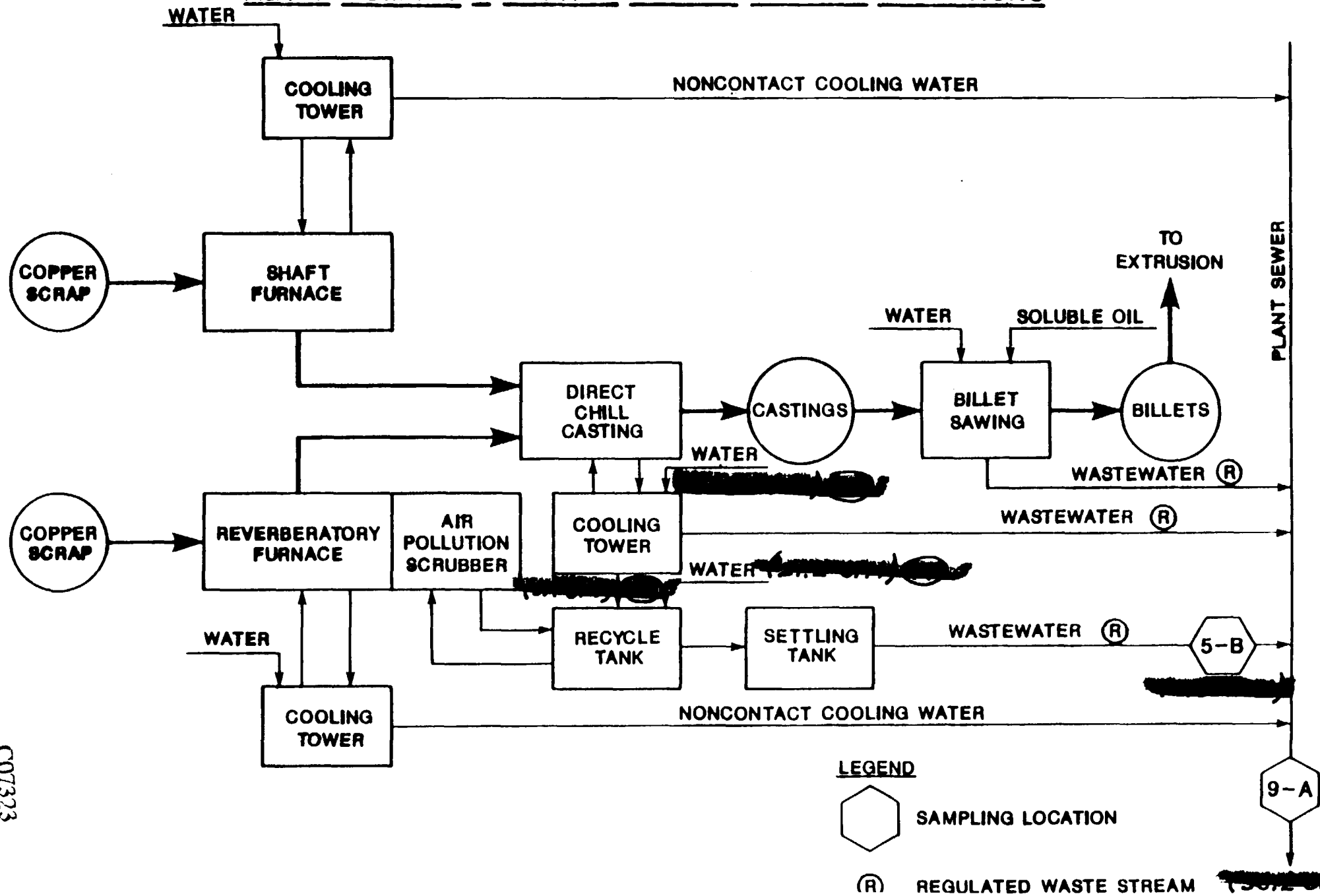
WASTE WATER FLOW

Dwg. No. _____

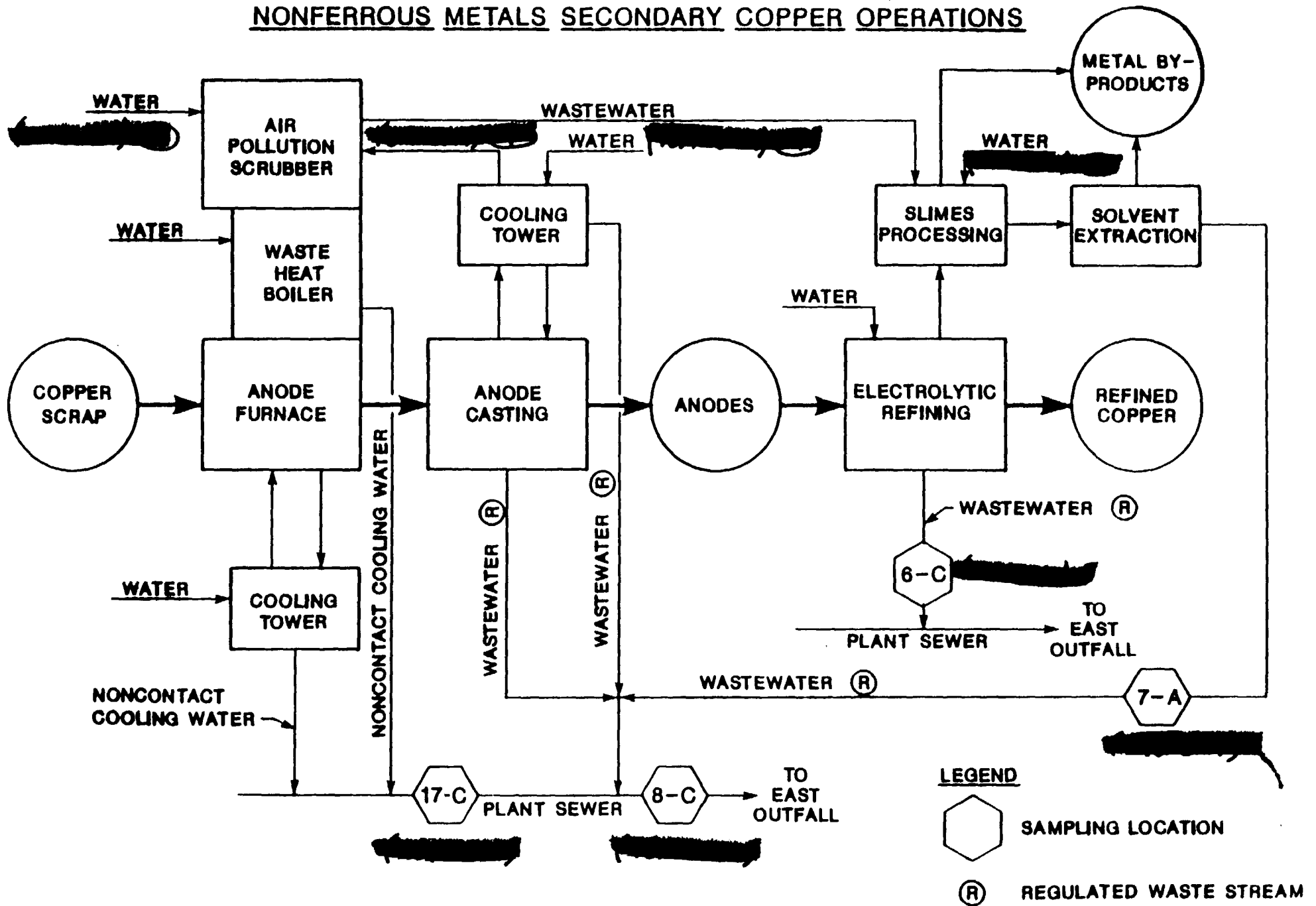


* TOTAL PROCESS - REGULATED + UNREGULATED

CERRO COPPER PRODUCTS COMPANY
PROCESSING FLOW DIAGRAM
METAL MOLDING & CASTING COPPER CASTING OPERATIONS






**CERRO COPPER PRODUCTS COMPANY
PROCESSING FLOW DIAGRAM
NONFERROUS METALS SECONDARY COPPER OPERATIONS**



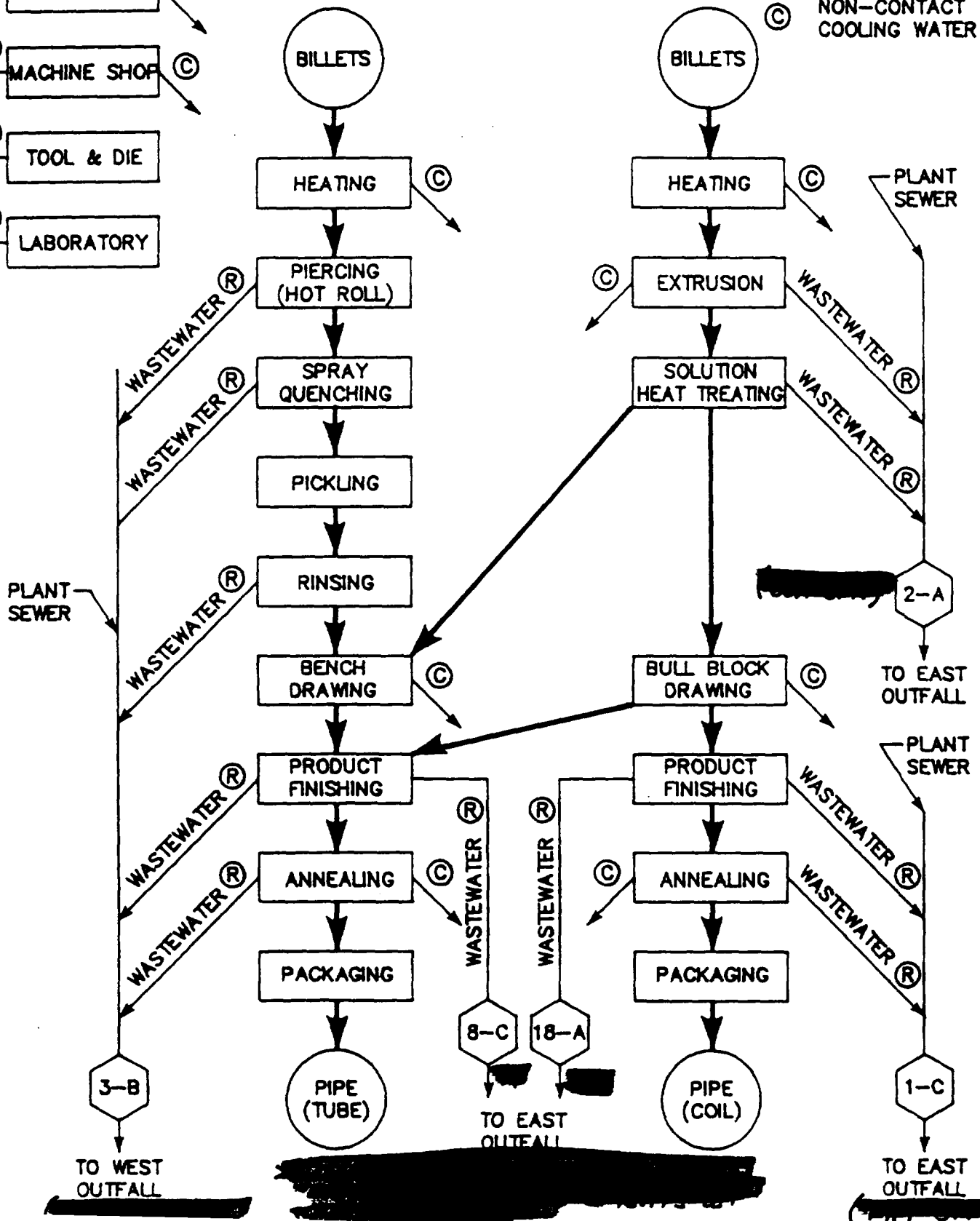
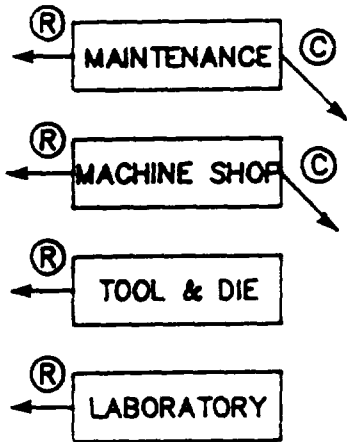
C07324

CERRO COPPER PRODUCTS COMPANY PROCESSING FLOW DIAGRAM COPPER FORMING OPERATIONS

LEGEND

-  SAMPLING LOCATION
-  REGULATED WASTE STREAM
-  NON-CONTACT COOLING WATER

SUPPORT OPERATIONS



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